

REMARKS

The following uses the paragraph numbering of the Office Action.

2. Claims 1, 4, 9 and 11 were rejected under Section 102(e) as being anticipated by US patent 5,164,981 ("Mitchell").

Background

An interactive voice response (IVR) system, of a type in wide current usage, may

(i) in response to a caller, send a first prompt signal, including an utterance (e.g.,

"please enter your account number");

(ii) receive a first data input from the caller (e.g., the account number);

(iii) send one or more further prompt signals, each including an utterance (e.g., requesting entry of further information); and

(iv) receive one or more further data inputs from the caller.

Thus, the IVR system **sends** prompt signals (including utterances) and **receives** data inputs for processing.

The present invention is not concerned with implementing the basic operation of an IVR system as described. The present invention is concerned with **verification** of call-flow as implemented by the IVR system.

Thus, suppose the above IVR system malfunctions, so that at (i) above the caller is sent an initial prompt signal including the utterance: "Please enter the desired loan amounts." Obviously, this utterance is erroneous and inappropriate (the caller and the nature of the inquiry had not even been identified yet). In response to the erroneous

prompt, the caller might hang up and the bank or other company relying upon the IVR system might never know that the system was malfunctioning, customers were being irritated and business opportunities were being lost.

The Invention

As concisely stated in the opening sentence of the application:

This invention relates to **testing** of interactive audio systems and, more particularly, to **verification** of content and flow of messages or prompts provided by a voice response system in the course of processing a user call. (Emphasis added.)

Fig. 8 outlines a call-flow verification method. Assume, that in Fig. 3, unit 10 represents an IVR system (whose accuracy of operation is to be verified) which is equipped to provide a variety of utterances, each in the proper context during user calls. For purposes of example, assume the objective is for automatic call generator (ACG) unit 16 to provide simulated user calls and data inputs, and then for responsive utterances from IVR system 10 to be received back by ACG unit 16, to be compared against the content of previously stored reference utterances to identify errors. Thus, ACG unit 16 will effectively **simulate** a user in order to provide data inputs, in order to elicit prompt signals from IVR system 10 including utterances. The utterances can then be checked for discrepancies by comparison of content against the content of a correct utterance (represented by prompt data stored in advance in the ACG unit).

For verification purposes, in one embodiment, prompt signals elicited from IVR system 10 by ACG unit 16 during call-flow verification (CFV) mode operation may be composite prompt signals including an utterance framed by coded signals included in the

prompt signal. See, for example, "Prompt Signals B" as illustrated at the bottom of Fig. 7A. Formatting and content of a composite prompt signal for CFV mode operation is described in greater detail on page 12 of the specification and a particular example is described at lines 12-24 on page 12.

Referring to the verification method of Fig. 8, in this example:

At step 41, prompt data representing correct utterance content is stored (e.g., in ACG unit 16 for comparison against utterances to be elicited from IVR system 10).

At step 43, a simulated user call is placed by ACG unit 16 to IVR system 10, whose operation is to be verified.

At step 44, an initial prompt signal from IVR system 10 is received by ACG unit 16 (e.g., representing the prompt which would be sent to a caller during normal operation).

At step 45, ACG unit 16 sends a responsive first data input to IVR system 10 (e.g., a number simulating customer entry of an account number).

At step 46, ACG unit 16 receives from IVR system 10 a second prompt signal responsive to the first data input (e.g., assume that this second prompt signal includes an **erroneous** utterance in response to the first data input).

At step 47, steps 45 and 46 can be repeated for successive data inputs and prompt signals.

At step 48, the content of the erroneous utterance included in the second prompt signal is compared against the data representing the correct utterance content, as previously stored in ACG unit 16 in step 41 above. Discrepancies, such as an inaccurate, missing or out of order utterance, can thus be identified.

It will be seen that verification, accomplished by comparison representing comparing received utterance content against the correct utterance content, enables identification of discrepancies indicating erroneous operation of the IVR system. This enables corrective action to be taken. Without such verification the bank or other company relying upon the IVR system to service its customers might never realize that erroneous responses were being provided to customers.

It will further be seen that this call-flow verification method, which utilizes simulated user calls, is distinct from the method employed by an IVR system itself to communicate with an actual user.

The Mitchell Patent

Mitchell discloses an IVR system adapted for “providing interactive data exchange between an outside party, an operator and one or more data bases” (Abstract).

In operation the Mitchell IVR system **receives** input data (e.g., user acts to “input selected information of the touchtone keypad”) and **sends** prompts (e.g., “providing human recognizable audio output signals”). Transfer of an incoming call to an operator is also provided for. (Column 2, line 59, to column 3, line 14.)

The basic objective of Mitchell is to configure his IVR system so that “telephone data inquiries are handled with increased efficiency and speed by reducing the redundant operations by either the computerized voice response unit or the operator.” (Column 2, lines 16-20.) A careful review of the Mitchell patent has identified no disclosure or suggestion of any verification of accuracy of the flow of prompts, or any desire to provide such verification.

The basic Mitchell objective is to increase efficiency and speed of operation of an IVR system. There is no suggested motivation to complicate operation. Mitchell does not disclose or provide any motivation for addition of any verification method or apparatus. To use information “gleaned only from applicant’s disclosure” to reconstruct Mitchell is improper (MPEP Section 2145 X A).

Claim 1

Claim 1 is directed to a four-step call-flow verification method. Mitchell fails to disclose or suggest any call-flow verification method. Mitchell is directed to improving efficiency of an IVR system during its processing of user calls.

While claim 1 must be considered in its entirety, step (c) specifies “**receiving** a second prompt signal” (emphasis added). In operation of Mitchell, prompt signals are **sent** to the user. Mitchell fails to disclose or suggest any step of “receiving” a prompt signal. In the method of claim 1, the second prompt signal is received in the context of making it available after receipt for subsequent comparison purposes. The Mitchell system does not receive any prompt signal and thus cannot make any received prompt signal available for comparison.

In claim 1, step (d) provides for “comparing content” of an utterance label included in the second prompt signal (“as represented by such coded signals included in the second prompt signal”) against “content of an expected utterance label.” Mitchell neither discloses nor suggests any such comparison whereby a received “content” is compared “against” expected “content” as set out in step (d). Applicant has found no actual, suggested or inherent comparison of prompt signal content in Mitchell.

To show anticipation, well established tests must be met. As stated in the MPEP:

A claim is anticipated only if each and every element **as set forth in the claim** is found, either expressly or inherently described, in a single prior art reference. (MPEP Section 2131, emphasis added.)

In the Office Action, a fragmentary approach is used in asserting anticipation. Thus, as to step (c) of claim 1, beginning at the bottom of page 3, fragments of claim wording are selected and it is asserted that a fragment of the wording of Mitchell “reads on” the claim fragment. The result does not meet the above test, because there is no showing of anticipation of step (c) “as set forth in the claim.” As established above, Mitchell **sends** informational prompts. However, there is no showing that Mitchell **receives** prompts. This is fully consistent with the Mitchell intended operation of an IVR system arranged to send prompts to a user. As between Mitchell and the present invention, applicant’s **receiving** of prompts is uniquely associated with call-flow verification, whereby prompts are received for comparison of content to identify use of erroneous utterance responses. Nothing similar is disclosed or suggested by Mitchell.

Step (d) of claim 1 specifies “comparing” received “content” representing an utterance “against content” of an expected utterance, as more fully set out in the claim.

In the first full paragraph on page 3 of the Office Action, without any citation to any relevant portion of the Mitchell disclosure, a fragmentary “reads on” approach is relied upon. However, there is no showing or assertion that Mitchell actually anticipates step (d) “as set forth in the claim.” Instead, it is stated that Mitchell discloses “inherently comparing” one entry against a second entry. It is not explained how this “inherently comparing” is carried out. More importantly, without a specific showing of where and how Mitchell is capable of implementing any relevant comparison and where and how

Mitchell suggests or inherently discloses such a comparison, no showing of anticipation is possible. Reference is made to Point (2), under the “GENERAL” heading below, as to the requirements of a showing of inherency.

Mitchell has not been shown to disclose anything at all about any verification method and is inadequate to anticipate applicant’s invention. Reconsideration and allowance of claim 1 are respectfully requested.

Dependent Claims 4 and 9

Claims 4 and 9, which would become allowable upon allowance of claim 1, also include further unanticipated elements. For example, claim 4 provides for **receiving** multiple prompts and **comparing** content. Mitchell discloses nothing similar.

Claim 11

While claim 11 must be considered in its entirety, the combination of steps encompassing “receiving” a second prompt signal and using that prompt signal, as received, for “comparing content” with predetermined content, as set out in claim 11, is not anticipated for the reasons discussed above with reference to claim 1. Such above discussion is hereby reiterated here by reference. In addition, Mitchell fails to disclose anything about “identifying discrepancies” as provided in step (c).

The elements of claim 11, as set forth in the claim, have not been shown to be expressly or inherently described by Mitchell. The Mitchell IVR system does not identify discrepancies as claimed.

Reconsideration and allowance of claim 11 are respectfully requested.

4. Claims 2, 5, 12-15 and 24 were rejected under Section 103(a) as being unpatentable over Mitchell in view of US patent 6,321,198 (“Hank”).

Application of Section 103 requires that an adequate *prima facie* showing be established. The criteria for such a showing include:

First, there must be some **suggestion or motivation** to modify a reference or to combine reference teachings.

Also, the prior art reference (or references when combined) must **teach or suggest all the claim limitations**. (See MPEP Section 2143.)

The MPEP specifies tenets of patent law which “must be adhered to” when applying Section 103, as including:

- (A) The claimed invention must be considered as a whole;
- (B) The references must be considered as a whole and must suggest the desirability and thus the obviousness of making the combination;
- (C) The references must be viewed without the benefit of impermissible hindsight vision afforded by the claimed invention (MPEP Section 2141, second subheading).

Dependent Claims 2 and 12

Claims 2 and 12, in the context of their respective parent claims and in the context of an interactive audio system having a **selectable** CFV mode activatable by a CFV sequence code, add a step (x) regarding “activating the CFV mode by sending the CFV sequence code,” as specified.

As shown above Mitchell fails to disclose or suggest any call-flow verification method involving **receiving** a prompt signal and using that received prompt signal for

comparing its content against predetermined correct content to identify discrepancies in utterance content.

At the bottom of page 4 of the Office Action, it is stated that Mitchell fails to teach “activating the CFV mode by sending the CFV sequence code.” It is then asserted that use by Hank of an IVR “call flow code” makes the subject matter of claims 2 and 12 obvious.

The showing to support this rejection fails to adhere to any of tenets (A), (B) and (C) reproduced above. As to tenet (A), applicant’s invention relates to a call-flow verification method **for use with** an interactive audio system. Hank merely activates call flow of such an interactive audio system and is not shown to have any relevance in the context of applicant’s invention considered as a whole (i.e., re a verification method as claimed). As to tenet (B), as discussed above a basic objective of Mitchell is “increased efficiency and speed” and the references fail to suggest why it would be desirable to add a remote control feature to further complicate operation of the Mitchell system. As to tenet (C), absent hindsight, what suggestion or motivation is there to add a remote control feature to Mitchell? None is identified in the Office Action and the stated motivation “to enhance the ability to create a call flow by producing call flow code” is counterproductive as Mitchell is already fully operative for his purposes and added complexity is not a motivation.

Dependent Claims 5, 13, 15 and 24

Claims 5, 13, 15 and 24 address novel combinations wherein DTMF tones in coded signals uniquely represent utterance label characters in ASCII format. It is not shown how any conversion by Hank of caller speech to ASCII format is relevant to

representation of ASCII format characters by DTMF tones. Assertion of a modification motivation based on recognizability of ASCII characters “by other computers and by communication devices” is not supported by Mitchell, whose operation fails to suggest any need for conversion to ASCII format. There is no showing that enhancement of communication with such external devices is desirable for Mitchell.

Claim 14

Claim 14 is directed to a call-flow verification method which includes: providing an IVR system having a CFV mode, in step (a); activating the CFV mode, in step (c); receiving a second prompt signal, in step (e); and comparing utterance content, in step (f); all as more fully set out in the claim.

On page 5 of the Office Action, with reference to claim 14, it is acknowledged that Mitchell “fails to teach” providing an IVR system having an IVR mode as set out in step (a). In a fragmentary approach, a number of word combinations of the Hank or Mitchell disclosures are identified and it is asserted that each “reads on” some portion of claim 14.

However, with reference to Section 103 tenets (A), (B) and (C) reproduced above, there is no consideration of the claimed invention as a whole, the references are not considered as a whole, and there is no showing as to where the prior art suggests the desirability of any combination of Hank with Mitchell. For example, beginning at the bottom of page 14 it is asserted that it would have been obvious “to modify Mitchell to provide IVR system having CFV mode as taught by Hank.” However, Hank is not shown to disclose anything about a selectable CFV mode, a CFV sequence code, or any aspect of call-flow verification. Hank is concerned with IVR operation, not with any

method for verifying operation of an IVR system. Also, while the rejection includes several conclusory statements about modifications to Mitchell, there is no showing of any basis for making such modifications except the teaching of applicant's disclosure. Where does the prior art provide any suggestion of providing a selectable CFV mode or a CFV sequence code?

Claim 14 covers a six step method. No adequate *prima facie* showing can be substantiated by assertions that the claim can be broken down into small wording fragments, each of which is collated to a wording fragment from a reference on the basis that it "reads on" the claim fragment. Tenets (A) and (B) above require the invention and the references each be viewed as a whole, to show how the six-step method of claim 14 is suggested by the references.

In view of the above discussion of the invention and of the Mitchell and Hank disclosures, which is repeated here by reference, it is respectfully submitted that steps (e) and (f) of claim 14 are not disclosed or suggested by these references. In addition, claim 14 is directed to a call-flow verification method including, in step (a), providing an IVR system "having a selectable call-flow verification (CFV) mode" as more fully addressed in the claim. **Neither** Mitchell nor Hank has been shown to provide any disclosure or suggestion regarding a CFV mode. Where neither patent of a combination discloses a particular claim limitation, the references are simply inadequate to meet the above-cited requirement that the references when combined "must teach or suggest all the claim limitations." Mitchell does not teach an IVR system, and Mitchell in view of Hank does not teach such an IVR system. The references do not teach or suggest the claim limitations and are inadequate to support the required *prima facie* showing.

Reconsideration and allowance of claim 14 are respectfully requested.

5. Claims 3 and 16 were rejected under Section 103(a) as being unpatentable over Mitchell in view of US patent 6,169,787 ("Shimada").

Dependent claims 3 and 16

Claims 3 and 16, which would become allowable upon allowance of their respective parent claims, also include further limitations of patentable significance.

Shimada discloses a telephone transaction support system and discloses nothing about an IVR system or a call-flow verification method. Other than hindsight use of applicant's disclosure, there is no apparent basis for combining any portion of the Shimada disclosure with Mitchell. Pursuant to tenet (B) reproduced above, some showing is a necessity to support this rejection. The asserted motivation regarding transaction approval is not shown to be relevant.

6. Claims 6-8 are rejected under Section 103(a) as being unpatentable over Mitchell in view of US patent 4,602,129 ("Matthews").

Dependent Claims 6-8

Claims 6-8, which would become allowable upon allowance of claim 1, also include further limitations of patentable significance.

For example, claim 7 relates to a capability to activate the CVF mode on each of two different bases. On the first basis, the CVF mode is activated so that the call-flow verification can be employed for a single test call. On the second basis, once the CFV mode is activated the call-flow verification method can be employed for a plurality of

calls. In each case, during periods when the CFV mode is not activated the interactive audio system is available to process incoming calls from users in the normal manner (see specification, page 3, lines 7-14). Nothing comparable is disclosed or suggested by Matthews or Mitchell.

7. Claim 10 is rejected under Section 103(a) as being unpatentable over Mitchell in view of US patent 5,594,791 ("Szlam").

Dependent Claim 10

Claim 10, which would become allowable upon allowance of claim 1, also includes a further limitation of patentable significance. Thus, the use of an automated call generator, as provided in claim 10 and in the context of the claim 1 method, is considered to provide a novel combination not disclosed or suggested by the references.

8. Claim 17 was rejected under Section 103(a) as being unpatentable over Mitchell in view of US patent 4,625,081 ("Lotito").

Claim 17

Claim 17 covers a call-flow verification code comprising at least an identification digit, a frame digit and an extent digit, as more fully set out in the claim. As described beginning at line 4 on page 16 of the specification, Fig. 9 shows an example of a CFV sequence code for use to activate and deactivate the CFV mode of an interactive audio system. Thus, these digits enable the CFV sequence code to provide a number of control functions, including turning the CFV mode on and off, controlling inclusion of utterances and determining how many utterance label characters are to be sent in DTMF format.

At pages 10 and 11 of the Office Action it is acknowledged that Mitchell “fails to teach” any of the above noted digits. Reference is then made to Lotito, which discloses an automated telephone voice service system, but fails to disclose anything about a code such as claimed in claim 17. In a fragmentary approach, specific words of the Lotito disclosure are referenced to words of the claim on a “reads on” basis, so that the three specific digits of claim 17 are sought to be collected from three different portions of the Lotito disclosure. This approach makes it clear that tenets (A), (B) and (C) are not being adhered to. Lotito is not being considered as a whole, with a showing of where Lotito suggests the desirability of applicants’ composite code as a whole. Also, a *prima facie* showing requires that it be established where the prior art suggests applicant’s invention, so as to make it clear that bits and pieces of the Lotito disclosure are not in fact being selected by hindsight using applicant’s disclosure as a blue print in an attempt to retroactively assemble applicant’s CFV sequence code as claimed. No such showing is provided in the Office Action.

For example, the disclosure referenced at column 156, line 64, to column 157, line 32, of Lotito, lacks the capability to activate anything. The Lotito system must already be activated, in advance, if it is to respond to a client’s personal ID code to gain “access to account ownership activities.” Thus, Lotito discloses nothing about indicating inclusion or exclusion of data from an audio signal. Further, the referenced portions of Lotito at column 140, lines 25-49, and column 152, lines 48-57, refer to use of a “start-of-message character” and an “end-of-message character”, but fail to disclose anything about a digit identifying the number of characters of an utterance, as in claim 17. As noted, assembly of bits and pieces of the Lotito disclosure is appropriate only if it is

clearly shown that such approach is supported by specific teaching in the prior art and is not based solely on an attempt to replicate applicant's code. The "motivation for modification" of Mitchell based on Lotito, as stated in the Office Action in three instances regarding claim 17, is supported only by applicant's disclosure ("different CFV mode", "contents of utterance label") without any showing of where the prior art suggests such modifications.

The disclosures of Mitchell and Lotito are inadequate to support the required *prima facie* showing. As to items asserted to be "inherently" taught by Lotito, reference is made to Point (2) under the "GENERAL" heading below. Reconsideration and allowance of claim 17 are respectfully requested.

10. Claim 19 was rejected under Section 103(a) as being unpatentable over Mitchell in view of Lotito and further in view of US patent 6,335,927 ("Elliott").

Dependent Claim 19

In the Office Action, reference is made to Fig. 69W, item 3, of Elliott as indicating "both activation of features and deactivation of features." However, in column 211, beginning at line 5, Elliott describes item 3 as merely representing "a request to activate or deactivate features" as one item of "a menu of items." Thus, a menu item of Elliott provides no teaching or suggestion of any digit of a code as claimed in claim 19.

No showing of the relevance of the Elliott menu request item has been provided. The "motivation for the modification", as stated, is unsubstantiated; the references provide no suggestion for introducing a digit for both activation and deactivation, as claimed.

11. Claims 21-23 were rejected under Section 103(a) as being unpatentable over Mitchell in view of Elliott.

In the Office Action, reference is made to column 9, lines 10-14, and column 272, lines 1-25, of Elliott. Elliott refers to use of pulse code modulation (PCM) encoding techniques for voice for transmission over the internet and other external networks.

Mitchell discloses a voice response system arranged to provide prompts to guide data entry by a user. Those prompts include utterances in the form of digitized voice prompts. (Column 1, lines 61-18.)

Claim 21

Claim 21 covers call-flow verification apparatus, usable with a system such as that of Mitchell, including both: an “encoding circuit” to provide coded signals representative of utterance content; and an “activation circuit” to enable activation so the prompt signals include the coded signals, as more fully set out in the claim.

Thus, Mitchell is arranged to provide “human recognizable audio output signals” as prompt signals to a system user (column 3, lines 12-13). However, considering claim 21, on what basis and for what purpose would it be desirable for Mitchell to operate “so that prompt signals provided by the system include” the “content of utterances in coded format”? No showing is provided. Mitchell meets its objectives by sending prompts simply in the form of audio. For Mitchell to also include the content of the audio prompt in coded format would confuse the user and be counterproductive.

The required *prima facie* showing is not determined by whether or not Elliott discloses an encoding circuit and an activation circuit. To meet tenets (A), (B) and (C) as

reproduced above, viewing Mitchell as a whole it must be established that the prior art suggests adding the circuits of claim 21 to Mitchell. Then it must be shown that it would be obvious to modify Mitchell to incorporate encoding as disclosed by Elliott. However, these references provide no suggestion of modifying Mitchell in this manner, particularly since no known benefit would ensue and Mitchell's objectives would be thwarted by increased complexity.

In addition, it has not been shown that Elliott discloses any "activation circuit" to enable activation of an encoding circuit, on a general basis. And, more particularly, there is no showing of disclosure by Elliott of an activation circuit to enable activation of an encoding circuit "so that prompt signals . . . include such coded signals" (e.g., content of utterances in coded format) as more fully provided in claim 21. The assertion of inherent teaching by Elliott is not substantiated (see Point (2) under the "GENERAL" heading below).

It is respectfully submitted that no *prima facie* showing meeting tenets (A), (B) and (C) above is possible on the basis of the cited references.

Dependent Claims 22 and 23

Claim 22 addresses call-flow verification apparatus wherein the activation circuit permits selection of prompt signals of different configurations.

The referenced portion of Elliott, at column 256, lines 10-17, deals with personal data entry by a system user in response to prompts. Elliott discloses nothing about an activation circuit permitting selection of different signal configurations as in claim 22.

Thus, Elliott fails to disclose the subject matter of claim 22 and there is no showing of any prior art suggestion of the desirability of modifying Mitchell in view of

the Elliott disclosure. The suggested motivation re having the activation circuit make a selection is available only by hindsight from applicant's disclosure and is not shown to be suggested by the cited references.

Claim 23 addresses call-flow verification apparatus wherein the activation circuit enables activation of the encoder to cause all characters of an utterance label to be represented by coded signals.

The referenced portion of Elliott, at column 63, lines 3-17, deals with consistent DTMF access as by keypad entry of alphabetic characters, with no disclosure of activation circuit enablement as in claim 23. Thus, even if it were obvious to modify Mitchell (which it is not) no relevant modification is provided by Elliott. The suggested motivation re leaving and retrieving voice messages is not relevant to activation of an encoder of a call-flow verification apparatus.

GENERAL

Point (1): Many of the rejections discussed above are predicated on a fragmentary approach whereby words taken out of context from a reference are used in a "reads on" assertion regarding words from one of applicant's claims. In each case, there is no substantiation to show where the reference teaches or suggests the "motivation for the modification" which is relied upon. It is respectfully submitted that the resulting showing is inadequate in each case, because tenets (A), (B) and (C) reproduced above are not adhered to as required for an adequate *prima facie* showing.

Adherence to tenets (A), (B) and (C) requires considering the invention as a whole, each reference as a whole, viewing the references free of hindsight, and providing

a showing of how and where the references suggest the desirability and obviousness of modifications relied upon in making the rejection. Also, there must be a showing establishing how and where the references teach or suggest each limitation of a rejected claim.

Reliance on the fragmentary “reads on” approach does not satisfy the required “as a whole” tenets and results in a failure to establish the required *prima facie* showing. Rather than repetition for each rejection above, this general statement of the absence of a *prima facie* showing is, by reference, applied to each rejection under Section 103.

Point (2): Many of the rejections rely upon assertions that a reference “inherently” teaches or discloses something. As quoted in MPEP Section 2163.07(a): “To establish inherency, the extrinsic evidence must make clear that the missing descriptive matter is **necessarily present** in the thing described in the reference Inherency, however, may not be established by probabilities or possibilities.” (Citing Federal Circuit opinions; emphasis added.)

Thus, for example, at the top of page 3 of the Office Action it is asserted that Mitchell further discloses “inherently comparing” a prompt entry against an entry as prerecorded. However, there is no showing that any such comparing is either present, or “necessarily present”, in Mitchell. In fact, applicant has found no disclosure by Mitchell to suggest a need, desire or mechanism for any such “comparing.”

Without a showing establishing that the missing element is “necessarily present” in the reference, there are not sufficient grounds to support a rejection. Rather than repetition for each relevant rejection above, this general statement regarding the

requirements of a showing that something is inherently taught is, by reference, applied to each such rejection.

SUMMARY

Entry and consideration of this amendment, reconsideration of all rejections and allowance of claims 1-24 are requested.

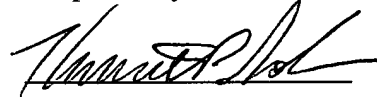
The cited references have not been shown to teach or suggest anything about call-flow **verification**, in general or as claimed. The inventions covered by the claims enable call-flow verification with benefits not suggested by the references. Consistent with this, it has been shown that the references fail to anticipate and are inadequate to support a required *prima facie* showing because they fail to teach or suggest all the claim limitations.

This application is considered to be in condition for allowance, which action is respectfully solicited.

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Respectfully submitted,



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